

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|----------------------|---|--------------------------------------------|---|----|---|---|---|---|---|---|---|-----------|---|----|---|----------|-----------------|----|-----------|----|----------|----|--|--|--|--|--|----|
| Transaction Code | | NPDES | | | | | | | | | | yr/mo/day | | | | | Inspection Type | | Inspector | | Fac Type | | | | | | | |
| 1 | N | | A | K | R | 0 | 6 | A | C | 1 | 0 | 1 | 5 | 0 | 8 | 3 | 1 | - | J | 2 | | | | | | | | |
| Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Inspection Work Days | | Facility Self-Monitoring Evaluation Rating | | | | | | | | | | BI | | QA | | Reserved | | | | | | | | | | | | |
| 67 | | 0 | 5 | 69 | | | | | | | | 70 | | 71 | | 72 | | 73 | | 74 | | 75 | | | | | | 80 |

Section B: Facility Data

| | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Alaska Airlines Ketchikan Station 1200 Airport Terminal Ketchikan, AK 99901 | Entry Time/Date 3:20 pm 8/31/15 | Permit Effective Date 4/1/2015 |
| | Exit Time/Date 5:50 pm 8/31/15 | Permit Expiration Date 3/31/2020 |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jeff Carlson, Customer Service Manager Alaskan Airlines, Inc. 907-225-4170, Cell: 907-223-2422, Fax: 907-247-0559 jeff.carlson@alaskaair.com | Other Facility Data (e.g., SIC NAICS, and other descriptive information) SIC 4512-Air transportation, scheduled NAICS: 481111-Scheduled Passenger Air Transportation | |
| Name, Address of Responsible Official/Title/Phone and Fax Number Jason Brown, Environmental Affairs Manager Alaskan Airlines, Inc. P.O. Box 68900 SEAZE, Seattle, WA 98168 jason.brown@alaskaair.com | <div> <div> <div> <div>Contacted</div> <div> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </div> </div> </div> <div> <div>Lat/Long:</div> <div>55.356185°/ -131.708658°</div> </div> </div> | |

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

| | | | |
|------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------------|------------------------------|
| <input checked="" type="checkbox"/> Permit | <input type="checkbox"/> Self-Monitoring Program | <input type="checkbox"/> Pretreatment | <input type="checkbox"/> MS4 |
| <input checked="" type="checkbox"/> Records/Reports | <input type="checkbox"/> Compliance Schedules | <input type="checkbox"/> Pollution Prevention | |
| <input checked="" type="checkbox"/> Facility Site Review | <input type="checkbox"/> Laboratory | <input checked="" type="checkbox"/> Storm Water | |
| <input type="checkbox"/> Effluent/Receiving Waters | <input checked="" type="checkbox"/> Operations & Maintenance | <input type="checkbox"/> Combined Sewer Overflow | |
| <input type="checkbox"/> Flow Measurement | <input type="checkbox"/> Sludge Handling/Disposal | <input type="checkbox"/> Sanitary Sewer Overflow | |

Section D: Summary of Findings/Comments



(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

| SEV Codes | SEV Description |
|-------------|-----------------|
| ● ● ● ● ● ● | ● ● ● ● ● |
| ● ● ● ● ● ● | ● ● ● ● ● |
| ● ● ● ● ● ● | ● ● ● ● ● |
| ● ● ● ● ● ● | ● ● ● ● ● |

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SEP - 8 2015

Inspection & Enforcement Management Unit
(IEMU)

| | | |
|------------------------------------------------------------------------------------------------|-------------------------------------|---------|
| Name(s) and Signature(s) of Inspector(s) | Agency/Office/Phone and Fax Numbers | Date |
| Brian Levo  | EPA/OCE/ 206-553-1816 | 9/8/15 |
| Catherine Beatty | ADEC/Anchorage/ 907-269-7560 | |
| | | |
| Signature of Management Q A Reviewer | Agency/Office/Phone and Fax Numbers | Date |
|  | EPA/OCE/ IEMU 3-0955 | 10/5/15 |

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9-14-15

JFB

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

| | | |
|----------------------------------------|------------------------------------------------|---------------------------------------------|
| A Performance Audit | U IU Inspection with Pretreatment Audit | ! Pretreatment Compliance (Oversight) |
| B Compliance Biomonitoring | X Toxics Inspection | @ Follow-up (enforcement) |
| C Compliance Evaluation (non-sampling) | Z Sludge - Biosolids | { Storm Water-Construction-Sampling |
| D Diagnostic | # Combined Sewer Overflow-Sampling | } Storm Water-Construction-Non-Sampling |
| F Pretreatment (Follow-up) | \$ Combined Sewer Overflow-Non-Sampling | : Storm Water-Non-Construction-Sampling |
| G Pretreatment (Audit) | + Sanitary Sewer Overflow-Sampling | ~ Storm Water-Non-Construction-Non-Sampling |
| I Industrial User (IU) Inspection | & Sanitary Sewer Overflow-Non-Sampling | < Storm Water-MS4-Sampling |
| J Complaints | \ CAFO-Sampling | - Storm Water-MS4-Non-Sampling |
| M Multimedia | = CAFO-Non-Sampling | > Storm Water-MS4-Audit |
| N Spill | 2 IU Sampling Inspection | |
| O Compliance Evaluation (Oversight) | 3 IU Non-Sampling Inspection | |
| P Pretreatment Compliance Inspection | 4 IU Toxics Inspection | |
| R Reconnaissance | 5 IU Sampling Inspection with Pretreatment | |
| S Compliance Sampling | 6 IU Non-Sampling Inspection with Pretreatment | |
| | 7 IU Toxics with Pretreatment | |

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

| | |
|-----------------------------------------|----------------------------------------------------------------|
| A — State (Contractor) | O — Other Inspectors, Federal/EPA (Specify in Remarks columns) |
| B — EPA (Contractor) | P — Other Inspectors, State (Specify in Remarks columns) |
| E — Corps of Engineers | R — EPA Regional Inspector |
| J — Joint EPA/State Inspectors—EPA Lead | S — State Inspector |
| L — Local Health Department (State) | T — Joint State/EPA Inspectors—State lead |
| N — NEIC Inspectors | |

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

***NPDES
Inspection Report***

***Alaska Airlines Ketchikan Station
Ketchikan, AK***

August 31st, 2015

Prepared by:

***Brian Levo
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit***

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- A. Site Map
- B. Photo Log
- C. Stormwater Pollution Prevention Plan
- D. Copies of the 2012, 2013, and 2015 Annual Reports

Alaska Airlines Ketchikan Station NPDES Inspection Report

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Jeff Carlson, Tim Cook, or from observations made during the inspection.)

I. Facility Information

Facility Name: Alaska Airlines Ketchikan Station

Facility Operator: Alaska Airlines, Inc.

SIC Code: 4512- Air transportation, scheduled

NAICS Code: 481111- Scheduled passenger air transportation

Facility Contact(s): Jeff Carlson, Customer Service Manager
Alaska Airlines, Inc.
907-225-4170, Cell: 907-223-2422
E-mail: jeff.carlson@alaskaair.com

Tim Cook, Supervisor
Alaska Airlines, Inc.

Jason Brown, Environmental Affairs Manager
Alaska Airlines, Inc.
P.O. Box 68900 SEAZE
Seattle, WA 98168
jason.brown@alaskaair.com

Address: 1000 Terminal Way
Ketchikan, AK 99901

Lat/Long: 55.356185° / -131.708658°

Permit Number: AKR06AC10

II. Inspection Information

Inspection Date: August 31st, 2015

Inspectors: Brian Levo, Inspector
EPA Region 10, OCE / IEMU
206-553-1816

Catherine Beatty, Environmental Program Specialist
ADEC Anchorage, AK
907-269-7560

| | |
|-----------------|---------------------------------------------------------------------------------------------------------------------------------|
| Arrival Time: | 3:20 PM |
| Departure Time: | 5:50 PM |
| Weather: | Cloudy/Partly Cloudy |
| Purpose: | Determine facility compliance with its National Pollutant Discharge Elimination System (NPDES) permits and the Clean Water Act. |

III. Permit Information

The Alaska Airlines Ketchikan Station is currently permitted under the Alaska Pollutant Discharge Elimination System (APDES) Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activity (MSGP) with the permit number AKR06AC10 and effective date of 4/1/15. Prior to this coverage the facility was covered by the EPA issued MSGP with the permit number AKR05CD16.

IV. Inspection Chronology

This was an announced inspection. I called Jason Brown, Environmental Affairs Manager, at the Alaska Airlines, Inc. (AS) office in Seattle, WA, on 8/20/15 and informed him that I would be conducting a routine NPDES inspection of the AS Ketchikan Station on 8/31/15. I also informed him that an Alaska Department of Environmental Conservation (ADEC) Inspector would be accompanying me during the inspection. Mr. Brown and I agreed to an afternoon inspection on 8/31/15 to immediately follow my NPDES inspection of the Ketchikan International Airport (KIA).

Catherine Beatty, ADEC Environmental Program Specialist, and I arrived at the facility at 3:20 pm on 8/31/15. We met both Jeff Carlson, Customer Service Manager, and Tim Cook, Supervisor, upon our arrival.

We began the inspection with an opening conference where we presented our inspector credentials and discussed the purpose and expectations of the inspection. We then conducted a records review followed by a site walkthrough and, finally, we held a closing conference to discuss compliance-related concerns. We were accompanied by Mr. Carlson and Mr. Cook during the entire inspection.

We were not denied access to the facility and were allowed to inspect all areas that we requested to inspect.

V. Background and Activity

AS is a tenant of the KIA. KIA is located on Gravina Island across the Tongass Narrows from the city of Ketchikan. KIA is operated by the Ketchikan Gateway Borough (KGB). The area inside the KIA fence line is 286.8 acres in size. The airport and surrounding

buffer reserve are approximately 2,500 acres. KGB owns the main terminal building. All surrounding areas and other buildings are owned by the Alaska Department of Transportation and Public Facilities (ADOT&PF) which leases KIA to KGB. AS subsequently subleases their building and operations spaces from KGB. According to facility representatives, KGB conducts annual reviews of the areas subleased by AS.

AS employs approximately 60 full-time employees at the Ketchikan Station.

According to the facility's site map, AS discharges stormwater from operations on the airport apron (**Attachment A**). Stormwater enters a trench drain stretching the entire length of the apron and routes stormwater to a 20,000 gallon oil-water separator that treats it before discharging off-site. The discharge enters a drainage ditch and is then routed to the Tongass Narrows.

Mr. Carlson and Mr. Cook said that this was the first stormwater inspection they had experienced. According to Mr. Carlson, he has been responsible for stormwater compliance at the facility since he came on-board 14 months ago. He said that he went through a multi-day environmental training at the AS Seattle office. Mr. Cook is Mr. Carlson's Supervisor and he said that he was responsible for stormwater compliance at the AS Ketchikan Station prior to Mr. Carlson.

VI. Records Review

The following documents were reviewed:

- AKR06AC10 Permit, Notice of Intent (NOI), and Acknowledgement Letter – Copies of these documents were on-file. The NOI was certified by Jeff Butler, VP of Airport Operations, and dated 7/29/15.
- Stormwater Pollution Prevention Plan (SWPPP) – The SWPPP on-file was composed by SLR International Corp and dated July 2015. A copy was e-mailed to me by the facility post-inspection and is included as **Attachment C**.

The content of the SWPPP included:

- SWPPP Certification – The SWPPP was certified by Mr. Carlson and dated 8/19/15.
- Site Map – Included as **Attachment A**.
- Pollution Prevention Team – Page 5 of the SWPPP states that the Customer Services Manager is responsible for quarterly monitoring and discharge monitoring report (DMR) preparation and submittal. However, facility representatives said that AS does not complete quarterly visual assessments or discharge sampling.

- Site Description – This portion included a subsection on page 6 that states that the AS SWPPP is in compliance with the KIA SWPPP (developed by the KGB) and meets the MSGP airport tenancy requirements.
- Potential Pollutant Sources - AS uses propylene glycol based deicing solution to deice aircraft. Facility representatives estimated that they typically use five to seven thousand gallons a year. The SWPPP states that pavement deicing and snow removal are conducted by KGB. KGB uses urea based deicers. Facility representatives confirmed that AS does not store or use urea.

Page 8 of the SWPPP states that a subcontractor is used to fuel the aircraft and this subcontractor is required to obtain its own MSGP coverage.

Page 11 of the SWPPP states that AS defaults any stormwater sampling and analysis to KGB, and that all information concerning these samples are included with their SWPPP.

- Stormwater control measures - The SWPPP includes spill prevention and response measures including prevention of aircraft fuel from entering storm drains in the event of spills. However, page 14 of the SWPPP states that the subcontractor responsible for aircraft fueling is responsible for implementing their own spill response measures.

Page 18 of the SWPPP states that AS conducts annual computer-based trainings between Jan.-Mar. that include SWPPP and Chemical Safety and Spill Response. Records of employee trainings are maintained digitally in an AS database. At the time of the inspection, training logs included in the SWPPP showed that various AS Ketchikan Station employees had completed SWPPP and Spill Prevention, Control and Countermeasure (SPCC) trainings between Jan.-Mar. 2015 (**Photo 3, Attachment B**).

- Monitoring and Inspections – Page 20 of the SWPPP states that KGB performs sampling, visual assessments, and subsequent reporting of these activities, on behalf of KIA and its tenants. The SWPPP also states that AS will review any potentially relative results once they are made available by KGB.

Pages 20-21 of the SWPPP state that routine facility inspections are conducted, at a minimum, monthly during the deicing season (October-April) and quarterly during other periods. Facility representatives said that they conduct the routine facility inspections monthly.

Page 22 of the SWPPP states that the annual comprehensive site inspection is completed by April 30th.

- Routine Inspection Reports – I reviewed the monthly routine inspection reports the facility had on-file dating back to Aug. 2012. There were no routine inspection reports on-file for Nov. 2012, Jan. 2013, Jun. 2013, Jul. 2013, and during the period from Nov. 2013 – Mar. 2015. Facility representatives said they were not sure where these reports were located, but Mr. Cook said he recalls conducting many of the 2014 routine inspections and completing their reports.

Reports on-file were signed by different facility representatives including Mr. Carlson, Mr. Cook, and Melvin Alvey, whose job title was listed as Ramp Service on the training log (**Photo 3**). Mr. Alvey completed and signed the most recent report which was dated 8/4/15 (**Photos 1 & 2**). Inspection reports were not certified.

- Annual Reports – Facility representatives had copies of annual reports for 2012, 2013, and 2015 on-file (**Attachment D**). A copy of the 2014 annual report was not on-file. None of the annual reports were signed or certified.

The industrial areas included in the comprehensive site inspections were the ground support equipment (GSE) area, the cargo warehouse, and the ramp aircraft parking area.

According to the facility representatives, AS has not completed any corrective actions.

Quarterly Visual Assessments – According to the facility representatives and the SWPPP, AS defers responsibility of conducting quarterly visual assessments of discharges to KGB. However, page 20 of the SWPPP states that AS records visual observations of discharges during routine inspections.

- Lab Reports & Chain-of-Custodies (COCs) – The facility has not completed analytical monitoring.
- Spill Prevention, Control and Countermeasure plan – Ms. Beatty reviewed the SPCC plan on-file. It was most recently amended in 2011 and included sections on spill response procedures, training records, roles and responsibilities, and monthly spill inspections of tanks.

VII. Facility Review

We began the facility review at the apron on the west side of the air cargo building and warehouse (**Attachment A**). No plane fueling or deicing happens immediately next to this building, however, commercial vehicles use this area to move luggage and cargo. There was a trench drain that collects the stormwater from this area and routes it northwest to the section of apron where airplanes park, fuel, and are deiced (**Photo 4**).

Forklifts are used inside the air cargo building and warehouse. I noted that there were

floor drains inside this building (**Photo 5**). Facility representatives were not sure where these drains were routed. A spill kit containing absorbent pads and other materials was located inside this building (**Photo 6**). On the northeast side of the air cargo building and warehouse was a 550 gallon heating oil tank. Drainage from this location routes to a storm drain on the KIA airport access road, however, no industrial operations appeared to take place in this area.

Next, we walked to the storm drain located at the south corner of the KIA terminal building (**Photo 7**). This drain receives stormwater from portions of the apron on the southwest side of the terminal building, but is not shown on the site map. Facility representatives said that this drain is not covered by the AS stormwater permit, but by the KIA stormwater permit. Facility representatives said that airplane deicing is conducted at least 50 ft. from the terminal after the planes have pushed back from the gate.

A fueling station was located on the northwest side of the apron against the facility fence line (**Photo 8**). A 200 gallon split tank containing both diesel and gasoline fuels was located inside a concrete secondary containment system. A drain was located inside the secondary containment system, but it is unclear where this drain routes. A cart containing spill kit materials and a shovel were located next to this fuel station (**Photo 9**).

Southwest of the fuel station were two manholes (**Photo 10**). Facility representatives said that the manholes were associated with the 20,000 gallon oil-water separator that treats drainage from the trench drain. Facility representatives were not familiar with whether maintenance had been conducted on the oil-water separator and said that KGB is responsible for maintaining the system. During the NPDES inspection of KIA earlier in the day on 8/31/15, Ms. Beatty and I inspected the outfall associated with this oil-water separator (**Photo 11**). Subsequently, we did not review this same outfall during this inspection.

Northeast of the fuel station were totes containing Type I and Type IV propylene glycol based deicing fluid stored on the outside of the GSE shop (**Photos 12 & 13**). The GSE shop is used to conduct maintenance and service on AS ground vehicles. There were two drains located inside the shop. At the time of the inspection, I noted that there were various waste oils and lubricants stored within proximity to one of the drains (**Photo 14**). Facility representatives were not sure where these drains were routed, but said that the used oils are shipped off-site annually and pointed out that a spill kit was stored inside the building.

VIII. Observed Discharge

I observed a discharge from the outfall earlier in the day on 8/31/15 during the NPDES inspection of KIA (**Photo 11**).

IX. Receiving Water

Discharge from the outfall flows through a drainage ditch that routes to the Tongass

Narrows.

X. Areas of Concern

A. SWPPP Inaccuracies

Section 5.2.7 of the AKR06AC10 permit states that the SWPPP must “Identify the staff members (by name or title) that comprise the facility’s storm water pollution prevention team as well as their individual responsibilities”.

Page 5 of the SWPPP states that the Customer Services Manager is responsible for quarterly monitoring and DMR preparation and submittal (**Attachment C**). However, facility representatives said that AS does not complete quarterly visual assessments or discharge sampling. Similarly, page 20 of the SWPPP states that these responsibilities are covered under the KIA SWPPP and not the AS SWPPP.

Section 11.S.3.3 of the AKR06AC10 permit states:

“The airport authority, in collaboration with its tenants, may choose to develop a single comprehensive SWPPP, or they may choose to develop individual SWPPP...If any operator develops a SWPPP for discharges from its own areas of the airport, that SWPPP must be coordinated and integrated with the comprehensive SWPPP. All operators and their separate SWPPP contributions and compliance responsibilities must be clearly identified in the comprehensive SWPPP...For each activity that an operator (e.g., the airport authority) conducts on behalf of another operator (e.g., a tenant), the comprehensive SWPPP must describe a process for reporting results to the latter operator and for ensuring appropriate follow-up...”

Additionally, **section 11.S.3.4** of the AKR06AC10 permit states:

“For multiple operators at an airport...each individual operator remains responsible for ensuring all requirements of its own MSGP are met...the failure of the entity allocated responsibility in the SWPPP to implement an MSGP requirement on behalf of other operators does not negate the other operator’s ultimate liability.”

On page 6 of the AS SWPPP it states that it is in compliance with the KIA SWPPP and meets the MSGP airport tenancy requirements. Page 20 of the SWPPP states that KGB performs sampling, visual assessments, and subsequent reporting of these activities, on behalf of KIA and its tenants. The SWPPP also states that AS will review any potentially relative results once they are made available by KGB.

During the NPDES inspection of KIA earlier in the day on 8/31/15, KGB representatives said that have not discussed developing a comprehensive SWPPP, or SWPPP responsibilities in general, with AS. KGB representatives said that they had no

knowledge of how AS implemented their SWPPP. The KIA SWPPP does not mention AS, however, KGB conducts quarterly visual assessments of the trench drain outfall and comprehensive site inspections of AS operations, though KGB said that the comprehensive site inspection only covers what can be seen from outside the fence and not inside the areas leased by AS.

Additionally, page 8 of the AS SWPPP states that a subcontractor is used to fuel the aircraft and this subcontractor is required to obtain its own MSGP coverage. However, the SWPPP does not name the subcontractor.

It appears that AS claimed to have worked with KGB in the development of a comprehensive SWPPP that assigned certain permit responsibilities belonging to AS to KGB due to their role as the KIA operator and lessor. However, conversations with KGB and review of the KIA SWPPP indicate that this has not occurred. Moreover, Aeroservices, Inc. is the subcontractor responsible for fueling, but any information specific to them and their operations are not included in the AS SWPPP. This lack of detail reinforces a need for a comprehensive SWPPP.

AS should work with KGB to develop a comprehensive SWPPP that covers the entirety of the industrial operations occurring at KIA.

B. Routine Inspection Reports Missing or Incomplete

Section 8.S.5.1 of the AKR05CD16 permit states that the permittee must “At a minimum conduct routine facility inspections at least monthly during the deicing season...”

Pages 20-21 of the SWPPP state that routine facility inspections are conducted, at a minimum, monthly during the deicing season (October-April) and quarterly during other periods. Facility representatives said that they conduct the routine facility inspections monthly.

At the time of inspection, there were no routine inspection reports on-file for Nov. 2012, Jan. 2013, Jun. 2013, Jul. 2013, and during the period from Nov. 2013 – Mar. 2015. Facility representatives said they were not sure where these reports were located, but Mr. Cook said he recalls conducting many of the 2014 routine inspections and completing their reports.

Section 6.1.2 of the AKR06AC10 permit states “The inspection report must be signed and certified in accordance with Appendix A, Subsection 1.12 of the permit.”

Subsection 1.12.3 of Appendix A of the AKR06AC10 permit states “Any report required by an APDES permit...must be signed by a person described in Appendix A, Part 1.12.2, or by a duly authorized representative of that person.”

Subsection 1.12.5 of Appendix A of the AKR06AC10 permit states “Any person signing a document under Appendix A, Part 1.12.2 or Part 1.12.3 shall certify as follows...” and includes a certification statement.

I noted that the routine inspection reports on-file were signed by different facility representatives, including Melvin Alvey, whose job title was listed as Ramp Service on the training log (**Photo 3**). Mr. Alvey completed and signed the most recent report which was dated 8/4/15 (**Photos 1 & 2**). Beneath his signature it states that a copy of the inspection report is to be sent to Environmental Affairs. In the pollution prevention team table on page 5 of the SWPPP, Environmental Affairs is listed as having regulatory review, compliance review, and auditing responsibilities.

The certification language specified in the MSGP was not included with the routine inspection reports and Mr. Alvey’s position description does not appear to meet the permit criteria to make him eligible to certify these reports. It is unclear if an Environmental Affairs office certifies these reports.

C. Annual Reports Missing or Incomplete

Section 7.2 of the AKR05CD16 permit states that the permittee “...must submit the annual report to EPA within 45 days (postmark date) after conducting the comprehensive site inspection...”

Subsection 1.12.1 of Appendix A of the AKR06AC10 permit states “Any application, report, or information submitted to the Department in compliance with a permit requirement must be signed and certified...”

At the time of the inspection, a copy of the 2014 annual report was not on-file. The copies of the 2012, 2013, and 2015 annual reports were not certified (**Attachment D**).

D. Uncertainty of Drainage and Maintenance

Section 5.2.4 of the AKR06AC10 permit states the permittee “must document areas at their facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released.”

Section 5.2.3.3 of the AKR06AC10 permit states the SWPPP site map must include “locations of all storm water conveyances including ditches, pipes, and swales;”

At the time of inspection, facility representatives were uncertain where the floor drains route to inside the air cargo building and warehouse (**Photo 5**) and the GSE shop (**Photo 14**). Drainage from these buildings is also not described in the SWPPP. Similarly, there was a drain located inside the secondary containment where the 200 gallon split fuel tank was located (**Photo 8**). This drain was not shown on the site map and it is unclear where it routes.

Subsection 1.12.1 of Appendix A of the AKR06AC10 permit states "A permittee shall at all times properly operate and maintain all facilities and systems of treatment and control and related appurtenances that the permittee installs or uses to achieve compliance with the conditions of the permit."

At the time of inspection, facility representatives were uncertain whether maintenance had been conducted on the 20,000 gallon oil-water separator that treats stormwater from the trench drain prior to discharge off-site. According to the facility, KGB is responsible for maintaining this system.

XI. Closing Conference

A closing conference was held with Mr. Carlson and Mr. Cook at the end of the inspection to discuss our observations. We identified all of the areas of concern listed above, with the exceptions of the details of conversations and documentation from the KIA NPDES inspection, certifications of the routine inspection reports, and drainage from the secondary containment at the fueling station. We then thanked them for their time and assistance with the inspection.

Report Completion Date:

9/30/15

Lead Inspector Signature:

Brian

ATTACHMENT A

Site Map



ATTACHMENT B

Photo Log

(All photographs were taken by Brian Levo on 8/31/2015)

Alaska Airlines Ketchikan Station NPDES Inspection Report

Monthly Inspection Checklist
Stormwater Pollution Prevention Plan
Alaska Airlines, Ketchikan International Airport

SECTION 1: ROUTINE FACILITY INSPECTION SUMMARY

Inspection Date: Aug 4 2015 Inspection Time: 1830

Name of Inspector(s): Melvin Alvey

Weather Conditions: ☐ No Rain/Snow ☒ Light Rain/Snow ☐ Heavy Rain/Snow

Deicing Season: ☐ Yes ☒ No
 If yes, please complete section 3 also.

Discharge Occurring: ☐ Yes ☒ No

Temperature: 60°F

SECTION 2: FACILITY INSPECTION (Complete Each Month)

A. Is there any evidence of leaks or spills from the following storage locations?

| | | |
|------------------------------|----------------------------------------|-----------------------------|
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> NA |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> NA |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> NA |
| <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | <input type="checkbox"/> NA |

If yes, please provide an explanation:

Example Language: A minor sheen was observed in a puddle in the maintenance area. The maintenance crew was notified.

B. Did you observe any previously unidentified discharges of pollutants from the Site?

☐ Yes ☒ No

If yes, please provide an explanation:

Example Language: A small diesel spill occurred during fueling. The spill did not reach the stormwater system.

C. Do any of the stormwater control measures need maintenance or repairs?

☐ Yes ☒ No

If yes, please provide an explanation:

Example Language: A catch basin near the GSE shop appears to not be draining properly.

D. Did any of the failed stormwater control measures need replacement?

☐ Yes ☒ No

If yes, please provide an explanation:

Example Language: The catch basin near the GSE shop was repaired and pumped; replacement is not needed.

E. Did you observe any issues/events that may adversely affect stormwater quality from the site?

☐ Yes ☒ No

If yes, please provide an explanation:

Example Language: Unauthorized wash water from equipment cleaning was observed entering the drain near the GSE shop.

1 of 2

Photo 1 (SI850055): Page 1 of the Aug. 2015 routine inspection report.

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F. Are any additional control measures needed or corrective action required to address the issues identified in 2E?

☐ Yes

☒ No

If yes, please provide an explanation:

Example Language: Staff was instructed that equipment cleaning must take place only in authorized areas that do not drain to stormwater. Signs were installed to act as reminders.

SECTION 3: DEICING SEASON INSPECTIONS

A. Is there any evidence of spills or leaks of deicing material at the ethylene glycol storage and transfer area?

☐ Yes

☐ No

If yes, please provide an explanation:

Example Language: A small amount of deicing material was observed flowing into the catch basin located adjacent to the tank.

B. Are these control measures for aircraft deicing and ethylene glycol storage and transfer being implemented?

Aircraft Deicing

- ☐ All dry-weather deicing is conducted at least 100 feet from any storm drain
- ☐ Use only the minimum amount of deicing fluid needed to ensure flight safety
- ☐ If available and practicable, use a lower deicing fluid mix ratio
- ☐ Ensure that the deicing truck is not parked within 50 feet of a storm drain when not in use

Ethylene Glycol Storage and Transfer

- ☐ Are bollards and/or stanchions placed around the ethylene glycol storage area
- ☐ Transfer area is not left unattended while transferring fluid
- ☐ Is the nearby storm drains covered with a drain mat while transferring fluid (if applicable)
- ☐ Are the personnel conducting the transferring operations properly trained

If not, explain why a particular control measure is not being implemented.

Example Language: The deicing truck is being stored near a catch basin. Facility is investigating a different location to store the deicing truck.

C. Were any corrective actions taken?

☐ Yes

☐ No

If yes, please explain any actions taken and the date they were complete or that they are proposed to be completed:

Example Language: A catch basin cover was ordered so that it can be covered during filling of the deicing truck.

D. What is the total amount of deicing fluid used in the previous month?

Month:

August

Amount (gallons):

0

Signature of Inspector(s):

Melvin W. Alvey

- Retain a copy of each monthly checklist with the SWPPP
- Submit a copy of each monthly checklist to Environmental Affairs upon completion

Photo 2 (SI850056): Page 2 of the Aug. 2015 routine inspection report.

Alaska Airlines Ketchikan Station NPDES Inspection Report

Course Completion Report

| Course Records - eCourses | | | | | | | | |
|------------------------------------------|---------|--------------------|------------------------------|-----------------------------|-------------|----------------|----------|-------------|
| Course: Storm Water Pollution Prevention | | | | Reference: KTR817 | | | | |
| Emp. # | Station | Dept | Student Name | Job Title | Start Date | Last Certified | Mark | Next Due |
| AS12038 | KTN | Station Operations | Abigails, Clarance Hernandez | Lead Ramp Service | 03 Jan 2015 | 03 Jan 2015 | Complete | 31 Mar 2016 |
| AS11578 | KTN | Station Operations | Alvey, Melvin Wayne | Ramp Service | 05 Jan 2015 | 05 Jan 2015 | Complete | 31 Mar 2016 |
| AS24044 | KTN | Station Operations | Anzuelo, Ogden O | Lead Ramp Service | 10 Jan 2015 | 10 Jan 2015 | Complete | 31 Mar 2016 |
| AS61617 | KTN | Station Operations | Barr, Marvin James | Ramp Service | 18 Jun 2015 | 18 Jun 2015 | Complete | 31 Mar 2016 |
| AS76506 | KTN | Station Operations | Bauer, Marsha A | Lead Customer Service Agent | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS56977 | KTN | Station Operations | Brown, Glenn J. | Ramp Service | 05 Mar 2015 | 05 Mar 2015 | Complete | 31 Mar 2016 |
| AS03080 | KTN | Station Operations | Bullock, Jennifer L | CSA - Air Freight | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS53048 | KTN | Station Operations | Burton, Andrew | Ramp Service | 10 Jan 2015 | 10 Jan 2015 | Complete | 31 Mar 2016 |
| AS53870 | KTN | Station Operations | Butler, Todd K | Designated Trn Lead Ramp | 15 Jan 2015 | 15 Jan 2015 | Complete | 31 Mar 2016 |
| AS63123 | KTN | Station Operations | Camp, Stephen J | Ramp Service | 20 Jan 2015 | 20 Jan 2015 | Complete | 31 Mar 2016 |
| AS87300 | KTN | Station Operations | Carlson, Jeffrey S | Customer Service Manager II | 30 Mar 2015 | 30 Mar 2015 | Complete | 31 Mar 2016 |
| AS96811 | KTN | Station Operations | Cook, Timothy James | Station Supervisor - Temp | 19 Jan 2015 | 19 Jan 2015 | Complete | 31 Mar 2016 |
| AS60910 | KTN | Station Operations | Dossert, Mary Margaret | Customer Service Agent | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS58202 | KTN | Station Operations | Eddy, Erin Elizabeth | Customer Service Agent | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS03300 | KTN | Station Operations | Fabry, Mary C | Customer Service Agent | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS01005 | KTN | Station Operations | Gonzales, Erlinda C | Lead Customer Service Agent | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS34205 | KTN | Station Operations | Gonzales, Neil | Ramp Service | 15 Jun 2015 | 15 Jun 2015 | Complete | 31 Mar 2016 |
| AS59090 | KTN | Station Operations | Goodwin, Mary Luther | Designated Trn CSA | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS01231 | KTN | Station Operations | Hendricks, Jamie S | CSA - Air Freight | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS69551 | KTN | Station Operations | Hoffman, Margaret A. | Customer Service Agent | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS51744 | KTN | Station Operations | Inondito, Archie | Ramp Service | 10 Mar 2015 | 10 Mar 2015 | Complete | 31 Mar 2016 |
| AS10389 | KTN | Station Operations | Lamm, Kathleen L | Lead Ramp Service | 05 Feb 2015 | 05 Feb 2015 | Complete | 31 Mar 2016 |
| AS66021 | KTN | Station Operations | Linne, Loreal R | Customer Service Agent | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS14124 | KTN | Station Operations | Manabat, Jennie R | Customer Service Agent | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS38020 | KTN | Station Operations | McClure, Amy | Ramp Service | 04 Jan 2015 | 05 Jan 2015 | Complete | 31 Mar 2016 |
| AS44256 | KTN | Station Operations | McNeil, Kerry | Designated Trn Lead CSA | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS32120 | KTN | Station Operations | Mecham, Melinda H | Customer Service Agent | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS81432 | KTN | Station Operations | Mesheh, Lacy H | Customer Service Agent | 31 Mar 2014 | 31 Mar 2014 | Complete | 31 Mar 2016 |
| AS88145 | KTN | Station Operations | Miller, Maria S | Ramp Service | 15 Mar 2015 | 15 Mar 2015 | Complete | 31 Mar 2016 |

24-Aug-2015 10:02 AM Page 1 of 2 For internal use only

Photo 3 (SI850058): Table of the most recent stormwater training of AS employees.

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Photo 4 (SI850060): Northwestern view of the trench drain stretching across the apron on the west side of the KIA terminal building.



Photo 5 (SI850062): Floor drains inside the air cargo building and warehouse.

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Photo 6 (SI850061): Spill kit stored inside the air cargo building and warehouse.



Photo 7 (SI850063): Storm drain near the south corner of the KIA terminal building. According to facility representatives, this storm drain is not covered by the AS stormwater permit.

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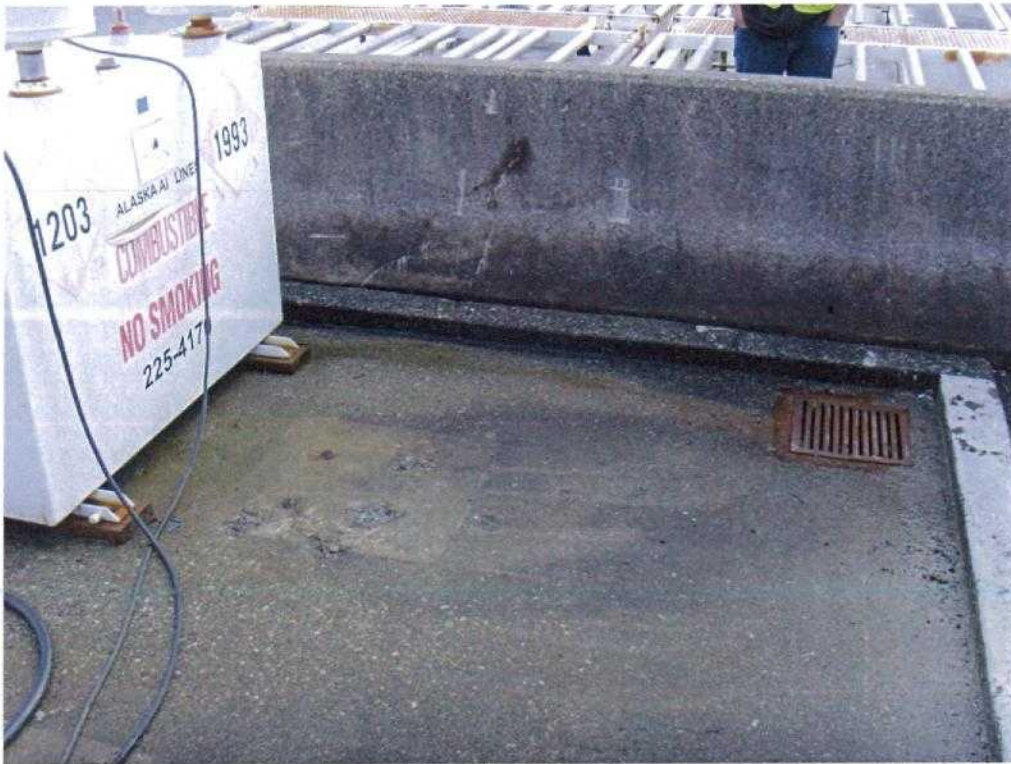


Photo 8 (SI850067): Fueling station located near the oil-water separator. Note the drain located inside the secondary containment.



Photo 9 (SI850068): Spill kit stored inside of an airport cart stationed next to the fueling station.

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Photo 10 (SI850065): View of the area where facility representatives said the oil-water separator was located.



Photo 11 (SI850053): Discharge from the oil-water separator prior to entering the drainage ditch.

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Photo 12 (SI850069): Totes containing Type I and Type IV propylene glycol based deicing fluid stored on the northwest side of the GSE shop.



Photo 13 (SI850071): Totes containing Type I and Type IV propylene glycol based deicing fluid stored on the northwest side of the GSE shop.

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Photo 14 (SI850073): One of two floor drains inside the GSE shop. Note the waste oils and lubricants stored within proximity of the drains. At the time of the inspection, facility representatives were not sure where these drains route.

ATTACHMENT C

Stormwater Pollution Prevention Plan



STORMWATER POLLUTION PREVENTION PLAN

FOR

ALASKA AIRLINES KETCHIKAN STATION KETCHIKAN INTERNATIONAL AIRPORT KETCHIKAN, ALASKA 99901

Prepared for:

Alaska Airlines

Environmental Affairs

Box 68900; SEAZE

Seattle, Washington 98168-0900

Phone: (206) 392-7949

SWPPP Prepared by:

SLR International Corporation

SWPPP Preparation Date

July 2015

Stormwater Pollution Prevention Plan

ALASKA AIRLINES KETCHIKAN STATION

Ketchikan International Airport
Ketchikan, Alaska 99901

This document has been prepared by SLR International Corporation. The material and data in this report were prepared under the supervision and direction of the undersigned.



Matthew Woods
Staff Engineer, E.I.T.



Melanie Bocianowski
Senior Geologist

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1. MANAGEMENT APPROVAL AND CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information contained therein. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information contained is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name of Official:

Jeff Carlson

Title of Official:

Customer Service Manager - Ketchikan

Signature of Official:

Jeff Carlson

Date:

8-19-15

Printed Name of Official:

Title of Official:

Signature of Official:

Date:

Printed Name of Official:

Title of Official:

Signature of Official:

Date:

Printed Name of Official:

Title of Official:

Signature of Official:

Date:

2. INTRODUCTION

This Stormwater Pollution Prevention Plan (“SWPPP” or “plan”) has been completed to fulfill the terms and conditions of the Alaska Pollutant Discharge Elimination System (APDES), 2015 Multi Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) administered by the Alaska Department of Environmental Conservation (ADEC). This SWPPP sets forth the procedures, methods, and equipment used to prevent the pollution of stormwater from Alaska Airlines (AS) operations at the Ketchikan International Airport located in Ketchikan, Alaska. AS leases a portion of the Ketchikan Airport from the Ketchikan Gateway Borough (the Borough). The Borough leases the airport from the Alaska Department of Transportation and Public Facilities (ADOT&PF) who own the airport. The drainage areas potentially affected by AS operations at Ketchikan Airport are shown on Figure 1 and will be referred to as “Site”. A copy of the MSGP will be maintained onsite with this plan or obtained at the ADEC website <http://dec.alaska.gov/water/wnpspc/stormwater/multisector.htm>. AS has submitted the Notice of Intent (NOI) to obtain coverage under the MSGP to Alaska Department of Environmental Conservation (ADEC). A copy of the submitted NOI application is included as Appendix A.

This plan is designed to complement existing laws, regulations, rules, standards, policies, and procedures pertaining to safety standards, fire prevention, and pollution prevention rules. The plan has been carefully prepared and has full approval of management, and all necessary resources to implement the plan are committed to the activities described.

2.1 PLAN OBJECTIVES

This plan has been prepared in accordance with good engineering practices and is certified by the responsible AS official for all ground operations, aircraft servicing, aircraft maintenance, facilities maintenance, air cargo, and ground support equipment (GSE) servicing and maintenance conducted at the Site. The objectives of the plan are to:

- Identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of stormwater at the Site;
- Identify authorized and unauthorized non-stormwater discharges from the Site;
- Identify and implement Site controls to reduce or prevent pollutants associated with industrial activities in stormwater discharges and authorized non-stormwater discharges; and
- Assure compliance with the terms and conditions of the MSGP.

2.2 PLAN REVIEW AND REVISION

Plan review and revision is important to the continued effectiveness, implementation, and compliance with the MSGP and may be initiated through a variety of activities including inspections, releases, and agency requirements. As defined in Permit Part 8.1 the plan will be reviewed and revised, as appropriate, and revisions implemented, if:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-storm water not authorized by this or another APDES permit) occurs at the facility;
- A discharge violates a numeric effluent limit (if notified by the Borough);
- AS becomes aware, or ADEC determines, that control measures are not stringent enough for the discharge to meet a WQS in the receiving water;
- An inspection or evaluation of the facility by an ADEC or EPA official determines that modifications to the control measures are necessary to meet the non-numeric effluent limits; or
- It is found in the routine facility inspection, quarterly visual assessment, or comprehensive site inspection that the control measures are not being properly operated and maintained.

Additionally, as defined in Permit Part 8.2, AS will review the selection, design, installation, and implementation of control measures if:

- Construction, or a change in design, operation, or maintenance at the facility, significantly changes the nature of potential pollutants discharged in stormwater or increases the quantity of pollutants discharged; or
- The average of four quarterly sampling results exceeds an applicable benchmark (if notified by the Borough). If less than four benchmark samples have been taken, but the results are such that an exceedance of the four quarter average is mathematically certain (i.e., if the sum of quarterly sample results to date is more than four times the benchmark level) this is considered a benchmark exceedance, triggering this review.

Revisions to this SWPPP must be completed within 30 calendar days following the inspection. Modifications to this SWPPP should be tracked in Table 1.

Table 1. Record of SWPPP Modification

| Description of Change | Name | Date | Signature |
|-----------------------------|------|-----------|-----------|
| Develop SWPPP per 2015 MSGP | SLR | July 2015 | |
| | | | |
| | | | |
| | | | |

2.3 PLAN AVAILABILITY

This SWPPP will be maintained onsite and will be made available for review upon request by the ADEC or USEPA. A copy of this SWPPP is also maintained on file at ADEC. ADEC may provide access to portions of the SWPPP to a member of the public upon request.

2.4 RECORDKEEPING

The Site's environmental file is located in the Operations office. This plan including all revisions, spill reports, NOI application, and other environmental documents are maintained by the Alaska Airlines Customer Service Manager (CSM) and copies are filed with corporate Environmental Affairs department. Training records are maintained electronically through the Alaska Airlines/Horizon Air Greenlight System. AS' Spill Prevention, Control and Countermeasure (SPCC) Plan for the Ketchikan Airport is also maintained by the CSM. Additional details regarding record keeping requirements are found in Section 8 of this plan.

3. POLLUTION PREVENTION TEAM

The AS environmental program is structured on the Company's commitment to preservation of the environment as an essential part of being a responsible corporate citizen. As a means of fulfilling this commitment, a Stormwater Pollution Prevention (P2) Team has been formed consisting of both corporate and Site management. The team consists of a coordinator (Customer Services Manager) at the station and other identified individuals to be responsible for developing the plan and assisting the station in its implementation. A list of team members and a brief description of their primary area of responsibility regarding stormwater pollution prevention is provided in Table 2. Each member of the P2 Team has access to the applicable portions of the MSGP and this SWPPP.

Table 2. Pollution Prevention Team

| Title | Primary Responsibilities |
|---------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Customer Services Manager/SWPPP Coordinator | SWPPP updates, specific BMP maintenance/implementation, routine inspections, quarterly monitoring, implementation of correct actions, DMR preparation and submittal. |
| Customer Services Agents, Applicable AS Supervisors, and Contractor Staff | Daily informal site inspection, spill prevention and response, BMP implementation, corrective action implementation as directed by the Customer Services Manual. |
| Director/Managers, Environmental Affairs | Regulatory review and updates, site-specific training on stormwater issues, evaluations and recommendations of appropriate BMPs, compliance review and auditing. |

4. SITE DESCRIPTION

AS leases the space located at the Ketchikan Airport from the Borough. A Site Location Map has been included as Figure 1 and includes the drainage area potentially affected by AS operations. The AS leasehold at the Ketchikan Airport consists of the terminal building, the air cargo building and warehouse, and the GSE shop. A Drainage Area Site Plan has been included as Figure 2. Aboveground storage tanks (ASTs) at the facility are described in Table 3. Stormwater at the Site flows to a trench drain that discharges to an oil water separator before discharging to a nearby drainage ditch and eventually Tongass Narrows.

4.1 ACTIVITIES DESCRIPTION

The industrial activities conducted by AS at the Site include aircraft fueling (conducted by a subcontractor), aircraft deicing, pavement deicing, oil and chemical storage, GSE servicing, maintenance and fueling, fleet service, and emergency aircraft maintenance.

Ketchikan Airport is owned and operated by the Borough and their operations are covered by a separate permit and SWPPP.

4.1.1 INTEGRATION WITH THE KETCHIKAN AIRPORT SWPPP

The Borough has prepared a SWPPP specific to their operations at Ketchikan Airport including runway, taxiway, and apron deicing, vehicle maintenance and fueling, station maintenance, raw material storage and handling, management of refuse locations, and storage and maintenance of material handling equipment. The Borough requires each of the tenants to designate an individual or a team responsible for implementation of, and compliance with, their station specific SWPPP. This plan is consistent with the governing MSGP regulatory requirements with respect to the landlord/tenant relationship.

4.2 STORMWATER DRAINAGE

Figure 2 depicts the AS leased space at the Ketchikan Airport in relation to stormwater facilities and flow direction. Stormwater from AS leased areas would drain to a trench drain located south of the buildings. Water in the drain flows west to a 20,000-gallon oil water separator before discharging offsite to a nearby drainage ditch. Water in the ditch eventually discharges to the Tongass Narrows. Stormwater flows across the apron which includes deicing and GSE parking areas. Stormwater northwest of the GSE shop flows to a catch basin that discharges directly to the drainage ditch. Stormwater north of the air cargo building also flows to a catch basin. This catch basin discharges into an underground culvert and conveyance system maintained by the Borough.

The facility does not discharge to waterbodies that are on Alaska's 303(d) list.

5. POTENTIAL POLLUTANT SOURCES

5.1 INDUSTRIAL ACTIVITIES AND ASSOCIATED POLLUTANTS

AS industrial activities with potential pollutant sources are described below and include aircraft fueling (conducted by a subcontractor), loading and unloading operations, aircraft deicing, pavement deicing, GSE fueling, oil and chemical storage, emergency aircraft maintenance and servicing, fleet service, and GSE servicing and maintenance. These activities are further explained below and the locations are shown on Figure 2.

5.1.1 LOADING AND UNLOADING OPERATIONS

Loading and unloading of materials regularly occurs as a part of AS cargo and passenger aircraft, and maintenance operations. In general, these activities are not expected to significantly impact stormwater quality. Brief descriptions of each loading and unloading operation are described below:

Cargo and Passenger aircraft: Loading and unloading of aircraft occurs on the apron, south of the terminal building. Cargo and luggage are stored indoors in the terminal building and the air cargo building and warehouse. Materials handled are highly variable, ranging from luggage to hazardous materials. These materials have the potential to be exposed to stormwater only during loading and unloading from aircraft. Additionally, materials must be appropriately containerized and screened prior to air travel. Therefore, it is expected that the primary potential pollutant from these operations is trash and windblown debris.

Maintenance Operations: Most maintenance operations occur inside the GSE shop. Emergency aircraft maintenance may occur at the terminal gates. The unscheduled aircraft maintenance is performed by both AS maintenance and subcontractors. Typical materials transferred to support maintenance operations include petroleum, oils, and lubricants (POL), glycol, and various other maintenance fluids.

5.1.2 AIRCRAFT DEICING

Aircraft deicing at the Ketchikan Airport is conducted on the apron at dedicated areas after the aircraft has pushed back at the air cargo building and warehouse (see Figure 1). In rare situations, deicing may also occur on the apron south of the terminal building. Stormwater from the AS deicing area flows into a trench drain further described in Section 4.2. The potential pollutant from aircraft deicing is glycol.

AS submits a monthly record of the types and quantities of deicing fluid to the airport authority. This is further described in Section 5.2.2.

5.1.3 PAVEMENT DEICING

The Borough is in charge of pavement and runway deicing at Ketchikan Airport; therefore, this activity and associated potential pollutants are addressed in the Ketchikan Airport SWPPP. AS uses

small amounts of pavement deicing on their dedicated walkways; however, due to the limited pavement deicing conducted by AS, this activity is not expected to significantly impact stormwater quality. Urea containing pavement deicers are not used by AS.

5.1.4 SNOW REMOVAL

The Borough is in charge of snow removal and stockpiling at Ketchikan Airport; therefore, this activity and associated potential pollutants are addressed in the Ketchikan Airport SWPPP.

5.1.5 MAINTENANCE AND SERVICING

Occasional time-critical GSE maintenance is conducted outdoors. All other GSE maintenance and servicing activities are conducted indoors by a subcontractor and are not expected to come in contact with stormwater.

Emergency aircraft maintenance may occur outdoors and has the potential to impact stormwater quality. Chemical wastes generated as a result of the maintenance activities are stored in appropriate containers inside the GSE shop until shipment offsite. Potential pollutants from these activities include oil, grease, and solvent from maintenance activities.

5.1.6 WASTE GENERATION

Refuse generation includes trash and food waste that is collected in dumpsters at the Site. The dumpsters are located on paved surfaces. Stormwater contacting the dumpsters could enter the stormwater conveyance system. The Borough manages a majority of refuse locations at the Site; therefore, the Ketchikan Airport SWPPP includes these locations and the associated potential pollutants. However, AS independently manages two dumpsters with lids at the airport located outside the west side of the air cargo building and warehouse as shown on Figure 2. Potential pollutants from waste and garbage include: floatable debris, food waste, and other personal household type garbage. Waste containers are required to remain closed except when loading or unloading contents.

Hazardous and oily waste materials are managed by AS and its contractors in a manner consistent with applicable RCRA regulations. These materials are generated in various locations throughout the facility and are stored inside a designated secondary containment area in the GSE shop, as shown on Figure 2. Disposal is performed by appropriately licensed hazardous waste and used oil contractors. These materials have limited exposure to stormwater; however, potential pollutants include POL, spent aerosol cans, and glycol.

5.1.7 STORAGE AND FUELING

Chemical storage, fueling, and deicing activities have the potential to affect stormwater quality. Potential pollutants from these areas include Jet A fuel from aircraft refueling activities, used oil, heating oil, gasoline, and diesel. Aircraft fueling is performed by a subcontractor on the ramp via tanker truck (AS does not own or operate the fueling truck). The subcontractor is required to obtain its own MSGP and SWPPP. A detailed list of AS-owned storage tanks is provided in Table 3.

Table 3. List of Aboveground Storage Tanks

| Description | Location | Content | Capacity (gallons) |
|---------------------|----------------------------------------------------|----------------|-------------------------------|
| Heating Oil Tank | Outside, northwest of GSE shop | Heating oil | 550 |
| Heating Oil Tank | Outside, north of air cargo building and warehouse | Heating oil | 550 |
| Split Cube Tank | Outside, west of GSE shop, at fueling station | Gasoline | 50 |
| | | Diesel | 150 |
| Deicing fluid tank | Outside, west of GSE shop | Glycol | 6,500 |
| Deicing fluid totes | Outside, west and northwest of GSE shop | Glycol | 275 each |

5.1.8 GSE STORAGE AND PARKING

Active GSE equipment parking occurs facility wide. Idle or unused equipment is stored in designated areas as indicated on Figure 2. Vehicles and equipment are regularly maintained and stored or parked inside buildings to the extent practicable. Potential stormwater contaminants associated with equipment storage and parking activities include corroded metals and leaking fluids, such as diesel fuel, gasoline, oil, and grease.

5.2 AREAS OF POTENTIAL SPILLS AND LEAKS

The MSGP requires the location of potential spills or leaks, which can contribute pollutants to stormwater, be identified and their corresponding outfalls. These areas include the terminal gates where aircraft fueling and deicing occurs, and the storage tanks as described in Table 3 and shown on Figure 2.

5.2.1 PAST SIGNIFICANT SPILL AND LEAKS

For the purpose of this SWPPP, a significant spill or leak is one that is either greater than five gallons, is in excess of the chemical Reportable Quantity (RQ), enters a storm drain, or contaminates soil and/or surface water. AS maintains a database of historical significant spill records for each station and updates the records in the event of a spill. Significant spills and leaks are also recorded on the Chemical Spill Reporting Form (ZA-06) a copy of which is provided in Appendix B. Completed forms are maintained onsite with this SWPPP or in the station environmental file.

No significant spill, as defined in Permit Part 5.2.4.3, have occurred in the last 3 years.

5.2.2 ANTICIPATED DISCHARGES OF GLYCOL

Section 103(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) requires a facility to immediately report releases of hazardous substances (including glycol during routine deicing operations at airports) if, in a 24-hour period, the release is of a quantity equal to or greater than the RQ to the National Response Center (NRC). This facility however, uses exclusively propylene glycol based deicing fluids which does not have a RQ. Ethylene glycol is no longer used by Alaska Airlines at this facility. AS complies with standard aircraft deicing procedures in response to atmospheric/weather conditions in accordance with Federal Aviation Administration (FAA). As a part of FAA regulations, AS tracks the amount of glycol used daily on the Deicing/Anti-Icing Record (CWP-04), a copy of which is included in Appendix C. Completed forms will be maintained with this SWPPP or in the station environmental file.

5.2.3 SPILLS AND LEAKS

If there is a spill or leak of a chemical in excess of the applicable RQ, AS is required to make the appropriate agency notifications and complete a Corrective Action Form. These activities and contact information are further explained in Sections 6.5 and 7.5. AS Environmental Affairs can assist with this reporting as needed.

5.3 NON-STORMWATER DISCHARGES

An evaluation for the presence of non-stormwater discharges was completed as part of the Annual Comprehensive inspection under the 2008 MSGP in April 2015. Annual Comprehensive inspections performed under the 2015 MSGP will also identify the presence of non-stormwater discharges. These records will be kept with the SWPPP or in the station environmental file.

5.3.1 ALLOWABLE NON-STORMWATER DISCHARGES

Non-stormwater discharges that are allowed by the MSGP include:

- Discharges from fire-fighting activities;
- Fire hydrant flushings;
- Uncontaminated condensate from air conditioners, coolers, and other compressors and from the outside storage of refrigerated gases or liquids;
- Irrigation drainage;
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling;
- Pavement wash water where no detergents or hazardous cleaning products are used, and the wash waters do not come into contact with oil and grease deposits or any other toxic or hazardous material (unless cleaned up using dry clean-up methods).
- Wheel wash water that does not use detergents;
- Routine external building wash down that does not use detergents or hazardous cleaning products;
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated;

- Incidental wind-blown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but not intentional discharges from the cooling tower; and
- Discharges from the spray down of lumber and wood product storage yards where no chemical additives are used in the spray-down waters and no chemicals are applied to the wood during storage.

AS personnel may participate in fire training exercises however; these activities are organized by the Borough.

Sector S of the MSGP authorizes stormwater discharges from only those portions of an air transportation facility that are involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling and lubrication), equipment cleaning operations, or deicing operations.

5.3.2 PROHIBITED NON-STORMWATER DISCHARGES

Sector S of the MSGP does not authorize the discharge of aircraft, ground vehicle, runway and equipment wash waters; nor the dry weather discharges of deicing chemicals. If such discharges must occur as a result of AS operations, AS must apply for a separate APDES permit. Note that a discharge resulting from snowmelt is not a dry weather discharge.

AS does not perform washing of vehicles or equipment at this facility.

5.4 SALT STORAGE

There is currently no salt storage at the facility.

5.5 SAMPLING DATA SUMMARY

Due to the multi-tenant and airport contributions to stormwater runoff, AS defaults stormwater sampling and analysis (when applicable) to the Borough. All monitoring results and documentation are maintained by the Borough and incorporated within their SWPPP.

6. STORMWATER CONTROL MEASURES

Stormwater control measures are structures, policies, and standard operating procedures that are specifically intended to prevent the contact of stormwater discharges with pollutants. Control measures are categorized as non-structural (activity schedules, prohibition of practices, maintenance procedures) or structural (treatment measures, runoff controls, overhead coverage). Through effective implementation, stormwater control measures can prevent most stormwater pollution. The P2 Team implements the control measures mentioned below to minimize the discharge of pollutants into stormwater.

6.1 MINIMIZE EXPOSURE

The need for structural control measures is minimized when the exposure of pollutant sources to stormwater are reduced.

Industrial materials and activities will be located inside or beneath storm resistant coverings to the extent practicable. Loading and unloading areas, storage and disposal locations, and cleaning and maintenance activities will be situated in areas that are not exposed to stormwater to the extent practicable. If situating industrial activities and materials in storm-resistant locations is not practicable, activities and materials will be properly contained, monitored, and maintained.

Leaking connections, pipes, hoses, or valves will be promptly repaired or replaced. Spilled or leaked materials will be promptly contained and cleaned up.

Trucks and equipment will be routinely maintained to reduce pollutant exposure to stormwater. Equipment and vehicles which remain unused for extended periods of time will have their fluids drained to the extent practicable.

6.2 GOOD HOUSEKEEPING

Good housekeeping measures are identified in Table 4 with their respective responsible personnel.

Table 4. Good Housekeeping Activities and Responsible Personnel

| Good Housekeeping Activity | Responsible Personnel |
|-------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| Maintain and improve the GSE (emergency procedures are also in place for the GSE contractor to handle equipment malfunctions) | GSE Contractor |
| Inspect GSE contractor work areas and implement the SWPPP | Customer Services Manager |
| Implement material storage practices and properly label containers | Customer Services Manager |
| Maintain an up-to-date chemical inventory | AS personnel and contractors |
| Schedule routine housekeeping operations | Customer Services Manager |
| Storing materials in appropriate containers | AS personnel and contractors |
| Maintain well organized work areas | AS personnel and contractors |
| Do not store empty, open, or used drums outside | AS personnel and contractors |
| Keep lids on dumpsters; do not place used oil filters in dumpsters | AS personnel and contractors |
| Train employees about good housekeeping practices | Customer Services Manager |

6.3 PREVENTATIVE MAINTENANCE

Preventative measures to ensure aircraft, buildings, and equipment are managed properly are followed via a set of official company manuals. AS policy is to comply with the provisions of these manuals, which includes regular inspecting, testing, maintaining, and repairing of all industrial equipment and systems to avoid situations that may result in leaks, spills, and other releases of pollutants in stormwater discharged to receiving waters. GSE preventative maintenance is conducted by a contractor according to AS policies. Nonstructural control measures such as spill response supplies must also be diligently maintained. If AS finds that their control measures need to be replaced or repaired, they must make the necessary repairs or modifications within 14 days or as expeditiously as practicable.

6.4 EROSION AND SEDIMENT CONTROL

AS seldom, if ever, has operations that result in land disturbance and associated sediment and erosion control issues as part of normal operations. All AS work areas tend to be paved with asphalt or concrete, engineered structures and buildings, or otherwise designed to prevent ongoing erosion problems. However, to the extent that AS engages in construction and land disturbance projects for facility expansion or remodeling, contracts with contractors performing work will require compliance with engineering standards, permits, and practice regarding sediment and erosion control techniques.

6.5 SPILL PREVENTION AND RESPONSE

Spill prevention methods and response procedures are addressed in the following training courses administered by AS: Stormwater Pollution Prevention, Chemical Safety and Spill Response Awareness, SPCC, and Environmental Coordinator training. An in-field spill response training drill is

conducted during the 16-hour initial Environmental Coordinator class. The topics discussed during the spill prevention portion of these courses include container selection, secondary containment, proper maintenance of vehicles and GSE, inspection of tanks and work areas, and proper handling and storage of chemicals and liquid wastes.

Specific BMPs used for spill prevention and emergency clean-up include the following.

- Store bulk liquid chemicals (glycol, diesel, gasoline, etc.) in double-walled tanks, or within secondary containment structures.
- Locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas).
- Use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible. Drain fluids from equipment and vehicles prior to on-site storage or disposal.
- Spill kits are located on the refueling trucks, at the fueling station, in the GSE Shop, and in the air cargo building and warehouse.
- Maintain spill report forms (ZA-6, discussed below) that includes the following information for chemical and petroleum spills: date, time, amount, location, and reason for spill; date/time clean-up completed, notifications made and staff involved.

In addition, all aircraft fueling is performed by a third party who is responsible for spill response and maintaining appropriate spill equipment.

The Alaska Airlines Chemical Spill Reporting Form, (ZA-06), is completed during a significant spill event at the Site. A copy of this form is included in Appendix B. The CSM and Alaska Airlines Environmental Affairs department shall be contacted whenever a spill requires the completion of form ZA-06 or if a hazardous substance is released in excess of de Minimis levels (see explanation of de Minimis levels in Table 5). A summary of the above notification requirements as well as the requirements of any follow-up report is provided in Table 5.

Table 5. Notification Requirements in the Event of an Oil, Fuel, or Chemical Spill

| Agency | Spill Size/Media | Verbal Report | Phone Number | Written Report |
|------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|----------------------|-------------------------------------------------------------------|-------------------------------------------|
| National Response Center (NRC) | Soil, water or drains: Spills in excess of RQ or oil/fuel spills that create a sheen on water | Immediately (1 hour) | (800) 424-8802 | 30 days |
| ADEC | Hazardous substance: Any release of a hazardous substance | Immediately | (800) 478-9300 (24 hour) (907) 269-3063 (days) | Within 15 days of clean-up |
| ADEC | Oil/Fuel; Any release of oil to water or drains | Immediately | (800) 478-9300 (24 hour) (907) 269-3063 (days) | Within 15 days of clean-up |
| ADEC | Oil/Fuel; Any release >55 gallons to ground | Immediately | (800) 478-9300 (24 hour) (907) 269-3063 (days) | Within 15 days of clean-up |
| ADEC | Oil/Fuel; Any release >10 gallons and <55 gallons to ground | 48 hours | (800) 478-9300 (24 hour) (907) 269-3063 (days) | Within 15 days of clean-up |
| ADEC | Oil/Fuel; Any release of 1 to 10 gallons to ground | Not Applicable | (800) 478-9300 (24 hour) (907) 269-3063 (days) | Monthly written record |
| ADEC | Oil/Fuel; <55 gallons to impermeable secondary containment | 48 hours | (800) 478-9300 (24 hour) (907) 269-3063 (days) | Within 15 days of clean-up |
| Airport Dispatch & Fire Department | If completed a ZA-06, if hazardous substance in excess of de Minimis*, or if >5 gallons or >10 feet diameter of flammable liquid spilled | Immediately | (907) 225-6800 or by KGB radio (Emergency Fire Department) or 911 | Upon request |
| AS Dangerous Goods | All dangerous goods incidents (cargo freight or luggage) | 24 hours | (206) 392-9848 | DOT 5800 form within 1 week of occurrence |
| AS Environmental Affairs | >5 gallons or any amount to soil/water/drains | Immediately | (503)-384-4480 (days) | ZA-06 form within 1 week of occurrence |

*Note: De Minimis is defined as spills that occur during the normal course of handling or transferring materials from bins or containers, and minor drips from containers, bins, or vehicles.

6.6 MANAGEMENT OF RUNOFF

AS complies with standard aircraft deicing procedures in response to atmospheric/weather conditions in accordance with FAA regulations. Aircraft deicing at the Ketchikan Airport is conducted on the apron at dedicated areas after the aircraft has pushed back at the air cargo building and warehouse as well as at times the terminal building (see Figure 1). Drainage from the deicing areas flows through

an oil water separator prior to discharging offsite. AS does not perform snow removal or storage activities at their Site. Snow removal and storage activities are performed by the Borough and are therefore covered in the Ketchikan Airport SWPPP.

6.7 SECTOR-SPECIFIC CONTROL MEASURES

The MSGP states that a permittee must comply with Part 11 sector-specific requirements associated with their primary industrial activity. These sector-specific requirements are in addition to any requirements specified elsewhere in the permit. AS has outlined sector-specific stormwater control measures in the various company manuals. These manuals include the Emergency Response Guide, Ground Support Equipment Manual, Facilities Emergency Trouble Call Manual, Fueling Procedures Manual, Cold Weather Procedures Manual, SPCC plan, Safety Manual, and Environmental Manual. The control measures in the manuals are intended to provide the most effective methods to protect the environment, including minimizing stormwater pollution.

The P2 Team has identified the following sector-specific control measures to address the effluent controls for Sector S of the MSGP (air transportation). In the event of a spill or release, AS employees have been trained to follow AS spill response procedures and immediately clean up all spills and leaks using dry cleanup methods (i.e. absorbent materials).

6.7.1 AIRCRAFT FUELING (SUBCONTRACTED)

- Where feasible and there are no impacts to aviation safety, cover nearby storm drains with a drain mat while fueling.
- Ensure absorbent pads or drip pans are available during fueling in the event of a spill or leak.
- Do not leave area unattended while fueling.
- Inspect the area following each fueling.

6.7.2 AIRCRAFT MAINTENANCE

- Only emergency aircraft maintenance is performed at this facility.
- Ensure that all chemical materials are kept indoors and/or under cover and have secondary containment (liquids).
- If practicable, use a drip pan when conducting oil servicing of an aircraft.
- Ensure that oil and any other waste materials are properly stored, labeled, and disposed.

6.7.3 AIRCRAFT DEICING

- The dry-weather discharge of deicing chemical is not permitted by the MSGP.
- Use only the minimum amount of deicing fluid needed to ensure flight safety. Avoid excessive application of deicing products, to prevent contamination to stormwater.
- If available and practicable, use a lower deicing fluid mix ratio.
- When practicable and operationally feasible, park the deicing truck(s) at least 50 feet from a storm drain when not in use.

- Implementation of control measures, facility inspections, and monitoring must be conducted with particular emphasis on deicing activities throughout the deicing season (October – April).

6.7.4 GLYCOL STORAGE AND TRANSFER

- Place bollards and/or stanchions around the glycol storage area to reduce the potential of the container being breached by equipment/vehicles or other incidental damage.
- Do not leave area unattended while transferring fluid.
- If feasible, ensure that the deicing truck is not parked within 50 feet of any storm drain when not in use, or as far away as operationally practicable.
- Cover nearby storm drains with a drain mat while transferring fluid, if possible.
- Store and transfer deicing materials on an impervious containment pad.
- The CSM is responsible for ensuring that personnel transferring glycol are properly trained.

6.7.5 GSE AND VEHICLE FUELING

- Do not leave area unattended while fueling.
- Have absorbent pads or drip pans available during fueling in the event of a spill or leak.
- If applicable, place safety cones around the fueling area to reduce other vehicle traffic and minimize potential for release.
- Where applicable, cover nearby storm drains with a drain mat while fueling.

6.7.6 GSE PARKING AREAS

- Perform routine inspections of the vehicle parking areas.
- Maintain vehicles in good working order to prevent unnecessary spills and leaks.
- Where practicable, park vehicles at least 50 feet from the closest storm drain.
- Spill kits are placed at or near AS operational areas enabling employees to respond quickly to a spill. See Figure 2 for spill kit locations.

6.7.7 GSE MAINTENANCE (SUBCONTRACTED)

- With the exception of occasional time-critical maintenance of GSE outdoors, all maintenance and servicing activities are conducted indoors and do not come in contact with stormwater.
- Maintain vehicles in good working order to prevent unnecessary spills and leaks.
- Use drip pans when applicable.
- Properly dispose of all garbage and chemical wastes.
- Use secondary containment when storing hazardous materials and oil outside.
- Ensure that oil and any other waste materials are properly stored, labeled, and disposed.
- Report leaking GSE or other vehicles immediately and place a drip bucket beneath the equipment until the problem is corrected.

6.7.8 GSE WASHING

Washing of GSE outdoors is prohibited if the wash water discharges to the stormwater conveyance system. If GSE washing does occur outdoors, ensure the wash water is contained and disposed of in an appropriate manner or discharged to the sanitary sewer.

GSE washing does not occur at this facility.

6.7.9 DELIVERY, STORAGE AND GROUND OPERATION AREAS

- Chemical materials are stored inside and/or under cover and have secondary containment.
- Routine inspections of the chemical storage areas and fuel ASTs are performed.
- All foreign object debris located in the AS leased areas is properly disposed of in containers that are closed while not in use.
- The Borough is responsible for maintaining and cleaning the ramp area, taxiways, and runways.

6.8 EMPLOYEE TRAINING

Training is an integral component of the MSGP and this SWPPP. Several environmental-related trainings are performed in the areas of air cargo, ground service operations, fleet service, aircraft maintenance, facilities maintenance, service center, purchasing, and stores. The training topics, affected workgroups, required recurrence, and a brief listing of the curriculum for each class is provided in this section. Training records are maintained electronically through the Alaska Airlines Greenlight System.

Initial training includes computer-based training modules produced in-house:

- Stormwater Pollution Prevention
- Chemical Safety and Spill Response Awareness

In addition, on-the job training is conducted reviewing and showing the location of the SWPPP, material storage, storm drains and spill equipment.

Annual refresher training is computer-based training, typically completed between January and the end of March. Refresher training discusses:

- How employees make a difference in complying with the SWPPP and preventing contamination of stormwater
- Stormwater Best Management Practices in an airport environment, including good housekeeping
- Spill recognition and response procedures

At least one member of the P2 Team is required to attend a 16-hour initial Environmental Coordinator training and maintain the Environmental Coordinator credential by completing annual refresher training. The P2 Team receives training on:

- Hazardous Waste Management
- Hazard Recognition and Hazard Communication
- Spill Prevention and Response

- Stormwater Pollution Prevention
 - Description of the facility
 - Identification of pollutant sources
 - Location of storm drains
 - Flow pathways to the storm drain
 - Source Control and Best Management Practices
 - Spill Response Plan
 - Required Employee Training

Employees who conduct fueling operations or have above ground storage tank management responsibilities receive SPCC training on an annual basis.

6.9 WASTE, GARBAGE, AND FLOATABLE DEBRIS

In general, good housekeeping practices reduce stormwater exposure to waste. In addition to those practices, exposed areas are kept free of waste, garbage, and floatable debris to prevent them from reaching receiving waters. Dumpster lids are kept closed and trash and/or waste materials are stored in covered areas or buildings. Hazardous or petroleum waste materials are properly disposed and will not be mixed with the general waste. The Site is kept tidy and free of floatable debris or waste. Waste materials such as spills, drips, or leaks; excess sediments; and floatable construction debris are immediately cleaned up.

6.10 DUST GENERATION AND VEHICLE TRACKING OF INDUSTRIAL MATERIALS

All AS work areas tend to be paved with asphalt or concrete, engineered structures and buildings, or otherwise designed to prevent dust generation from regular activities. In general vehicles tend to not leave the Site during normal operation, reducing the potential for vehicle tracking. No dust generating industrial activities occur at the Site. Proper spill cleanup response and good housekeeping procedures are practiced to reduce any tracking of materials.

7. MONITORING AND INSPECTIONS

The following section describes AS coordination and implementation of MSGP requirements for monitoring, inspection, and compliance evaluation reports.

7.1 STORMWATER VISUAL INSPECTIONS AND BENCHMARK MONITORING

Per Section 11.S.3.2, MSGP Implementation Responsibilities for Airport Authority and Tenants, the airport authority, in collaboration with its tenants, may choose to implement certain MSGP requirements on behalf of its tenants in order to increase efficiency and eliminate redundancy or duplication of efforts. At the Ketchikan Airport, the Borough performs sampling and visual assessment activities on behalf of itself and its tenants, including AS, and the associated reporting of these activities.

Any monitoring is conducted by the Borough and is outlined in the Ketchikan Airport SWPPP. All monitoring results and documentation are maintained and reviewed by the Borough and incorporated within their SWPPP. As such, analytical data potentially related to AS operations will be reviewed when made available by the Borough. If sampled discharges exceed the water quality parameters outlined in the 2015 MSGP, AS will review applicable areas of their operations, BMPs, and potential corrective actions. As defined in Permit Part 11.S.7, for airports where a single permittee, or a combination of permitted facilities use more than 100,000 gallons of pure glycol in glycol-based deicing fluids and/or 100 tons or more of urea on an average annual basis, the facility is required to monitor outfalls that collect runoff from areas where deicing activities occur for biological oxygen demand, chemical oxygen demand, ammonia and pH. AS's operations alone will not exceed the 100,000 gallons of pure glycol threshold; however, the Ketchikan Airport as a whole may exceed the threshold; if the threshold is exceeded the Borough will perform the required sampling.

In addition to performing sampling, all stormwater visual monitoring is conducted by the Borough; however, AS staff will endeavor to record any observations of stormwater pollution during the required inspections described below. Observations may include, but are not limited to, color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and any other obvious indicators of stormwater pollution.

7.2 ROUTINE FACILITY INSPECTIONS

As a requirement of the MSGP, AS must conduct routine inspections at least quarterly, and at a minimum at least monthly during deicing season or any month during which deicing chemicals may be used. Routine facility inspections are conducted of all areas where industrial materials or activities are exposed to stormwater and of stormwater control measures used to comply with the effluent limits contained in the MSGP. During the deicing season, the inspections will also include the requirements of Section 7.3 (deicing season inspections) of this plan. The inspections will be performed by a qualified member of the P2 Team, typically the CSM, during normal hours of operation. This inspection, as defined in Permit Part 6.1.1, includes:

- Areas where industrial materials or activities are exposed to stormwater;
- Areas identified in the SWPPP as potential pollutant sources;
- Areas where spills and leaks have occurred in the past 3 years;
- Discharge points; and
- Control measures used to comply with the effluents limits.

Similarly, Permit Part 6.1.1 specifies that during the inspection the inspectors must examine or look out for the following:

- Industrial materials, residue or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks and other containers;
- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the Site;
- Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas; and
- Control measures needing replacement, maintenance or repair.

At least once each calendar year, the routine facility inspection must be conducted during a period when a stormwater discharge is occurring. The routine inspection form is included as Appendix D. Completed checklists will be maintained with this SWPPP.

AS will review the results of visual and analytical monitoring, if provided by the Borough, for the past year when planning and conducting routine inspections. The CSM will immediately take action to mitigate problems identified during the routine inspections. As needed the CSM will coordinate required repairs with the appropriate AS departments (GSE Maintenance, etc.) or off-site contractors to address any stormwater quality issues. Records of maintenance activities associated with stormwater compliance will be stored with the SWPPP.

7.3 DEICING SEASON INSPECTIONS

In addition to conducting routine facility inspections (see Section 7.2) a formal deicing season inspection is required. The deicing season inspections utilize the same routine inspection form included in Appendix D and referenced under Section 7.2 (Section 3 of the form is specific to deicing season). The deicing season is typically from October to April. The goal of the deicing season inspections is to document observations of potential discharges of pollutants to receiving waters. Implementation of control measures, including any BMPs and facility inspections, must be conducted with particular emphasis throughout the defined deicing season. If impacts are observed (or the CSM is notified by the Borough of observations), the observations must be recorded on the checklist and the Maintenance Manager and/or CSM will be notified immediately so that corrective actions can be taken. The routine inspection form is included as Appendix D. Completed checklists will be maintained with this SWPPP or in the station environmental file.

7.4 ANNUAL COMPREHENSIVE SITE INSPECTION

As a requirement of the MSGP, AS must conduct an annual comprehensive site inspection. According to Section 11.S.6.2 of the MSGP, the annual inspection should occur during periods of actual deicing operations, if possible. If it is not practicable during active deicing because of weather, AS will conduct the inspection during the season when deicing operations occur and the materials and equipment for deicing are in place. Comprehensive site inspections must be conducted by qualified personnel with at least one member of the stormwater P2 Team participating in the comprehensive site inspections and must cover all areas of the Site affected by the requirements of the MSGP. This includes an inspection of the areas identified in the SWPPP as potential pollutant sources, where industrial materials or activities are exposed to stormwater, any areas where control measures are used to comply with the effluent limits, and areas where significant spills and leaks have occurred in the past 3 years. Inspectors must examine the following:

- Materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from equipment, drums, tanks, and other containers;
- Offsite tracking of materials or sediment where vehicles enter or exit the Site;
- Tracking of raw, final, or waste materials from areas of no exposure to exposed areas; and
- Control measures needing replacement, maintenance, or repair.

It is AS policy to complete the annual comprehensive site inspection by April 30th.

7.4.1 COMPREHENSIVE SITE INSPECTION DOCUMENTATION

An annual reporting form, included in Appendix E, will be used to record the results of the comprehensive site inspections. The record of each annual comprehensive site inspection and subsequent corrective action will be retained for at least three years from the date of permit expiration. Each inspection report will be signed by the qualified person and a SWPPP team member. The annual inspection documentation will be submitted to ADEC with the Annual Report. Additionally, control measure reviews, revisions, and corrective actions will be submitted with the Annual Report.

7.5 CORRECTIVE ACTIONS

If the following conditions are noted, AS will review and revise the selection, design, installation, and implementation of site control measures:

- An unauthorized release or discharge occurs;
- A discharge occurs that violates a numeric effluent limit (monitoring performed by the Borough);
- Control measures are noted or determined by ADEC to not be stringent enough to meet applicable water quality standards;
- An inspection or evaluation by an USEPA or ADEC official determines that modifications to the control measures are necessary to meet non-numeric effluent limits;
- Routine inspection, visual assessment, or comprehensive site inspection finds that control measures are not being properly operated or maintained; or

- Construction or a change in design, operation, or maintenance at the Site that significantly changes the nature of pollutants discharged in stormwater, or significantly increases the quantity of pollutants discharged.

In addition, modifications determined necessary will be made prior to the next storm event, or as soon as practicable following that storm event.

7.5.1 CORRECTIVE ACTION DOCUMENTATION

Discovery of any conditions requiring the review and/or revision of control measures will be documented within 24 hours. Documentation must include the condition triggering the need for corrective action review; description of the problem identified; and the date the problem was identified. Within 14 days of the discovery, any corrective action or further investigation will be documented, noting the summary of corrective action taken or to be taken; notice of whether SWPPP modifications are required; date corrective action initiated and date corrective action completed or expected to be completed. If no corrective action is necessary, the basis for that determination will be documented. Note that if the event triggering the Corrective Action Report is a permit violation, it must be documented using the Noncompliance Notification Form, found in Appendix F.

Control measure reviews, revisions, and corrective actions will be submitted with the Annual Report. Corrective action documentation will be retained in the SWPPP files.

8. REPORTING AND RECORDING KEEPING

8.1 ANNUAL REPORT

The MSGP 2015 indicates that monitoring data and reports are required to be submitted to ADEC. Monitoring at Ketchikan Airport is performed by the Borough.

8.1.1 ANNUAL REPORTING

The Annual Report will be submitted to ADEC that includes findings from the comprehensive site inspection and any corrective action documentation. If corrective action is not yet completed at the time of the submission of the annual report, AS will describe the status of any outstanding corrective actions. In addition to the information required in the Corrective Action Report and the Site Inspection documentation, AS will also include the following information with their annual report:

- Facility name;
- APDES permit tracking number;
- Facility physical address; and
- Facility contact person name, title, and phone number.

A copy of the Annual Report Form is provided as Appendix E of this SWPPP as well as on the ADEC website at <http://dec.alaska.gov/water/wnpspc/stormwater/Forms.htm>. The Annual Report may be submitted electronically through the DEC Online Application System (OASys) located at <http://www.dec.alaska.gov/water/oasys/index.html>. The Annual Report is due within 45 days of the annual comprehensive site inspection, but in no instance later than February 15th of the year following the reporting year and can be submitted to the address listed in Section 8.1.3 of this SWPPP or via OASys.

In addition, USEPA or ADEC may request all or a portion of the information collected and maintained in the SWPPP.

8.1.2 ADDITIONAL REPORTING

The following will be reported to ADEC when applicable.

- Any noncompliance which may endanger health or the environment will be provided orally within 24 hours from the time AS becomes aware of the circumstances. Subsequently, a written 5-day follow up report to the 24-hour oral report is required.
- A leak, spill, or other release of a hazardous substance or oil in an amount equal to or in excess of applicable reportable quantities will be reported.
- Planned physical alterations or additions to the facility that qualify the facility as a new source or that could significantly change the nature or significantly increase the quantity of pollutants discharged.
- Planned facility changes or activities which could result in noncompliance with MSGP requirements.
- Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in and compliance schedule of the MSGP.

- Instances of noncompliance not reported in monitoring reports, compliance schedule reports, or 24-hour reports, at the time the monitoring report is submitted.
- Relevant facts or information that were previously omitted or found to be incorrect in the NOI or any report.

8.1.3 ADDRESS FOR REPORTS

Notice of Intent, Notice of Intent modification, Notice of Termination, No Exposure Certificate, and SWPPP's should be submitted using ADEC's eNOI system (<http://dec.alaska.gov/water/wnpspc/stormwater/APDESeNOI.html>) or sent to the following address:

State of Alaska
Department of Environmental Conservation
Division of Water
Wastewater Discharge Authorization Program
555 Cordova Street
Anchorage, Alaska 99501
Telephone (907) 269-6285
Fax (907) 269-3489
Email: DEC.Water.WAPermit@alaska.gov

Annual Reports may be submitted electronically via OASys located at <http://www.dec.alaska.gov/water/oasys/index.html>. Copies of any other reports not otherwise submitted electronically must be sent to the following address:

State of Alaska
Department of Environmental Conservation
Division of Water
Compliance and Enforcement Program
555 Cordova Street
Anchorage, Alaska 99501
Telephone Nationwide (877) 569-4114
Anchorage Area / International (907) 269-4114
Fax (907) 269-3489
Email: dec-wqreporting@alaska.gov

8.2 RECORD KEEPING REQUIREMENTS

The following records will be maintained with the SWPPP.

- A copy of the NOI and any associated data and correspondence.
- A copy of the ADECs acknowledgment letter or eNOI system assigning the permit tracking number.
- A copy of the Multi-Sector General Permit #AKR060000 (an electronic copy is acceptable).
- Description and date of significant spills, leaks, or other releases that resulted in discharges to the waters of the U.S. through stormwater. Including circumstances leading to the release, response taken, and measures implemented to prevent recurrence.

- Employee training records.
- SWPPP inspection reports:
 - Routine Facility Inspection Reports.
 - Visual Assessment Reports.
 - Annual Comprehensive Site Inspection Reports.
- Descriptions of any deviations from the inspection schedule.
- ADEC MSGP Annual Report.
- Corrective Action Log and a description of any corrective actions taken subsequent to inspection, corrective actions for effluent limitation exceedances, etc.
- Documentation of planned and unplanned maintenance and repairs of control measures. For unplanned document discovery of need, date when returned to full function, and justification for extended maintenance/repairs.
- Log of SWPPP modifications.
- A copy of the Notice of Termination (NOT), if applicable.

Stormwater records must be retained for three years from the date of permit expiration or termination.

